REMARKS

Claims 1, 4-22, 24-38 are pending in the present application.

Office Action of September 15, 2003

Applicant has carefully reviewed and considered the Office Action of September 15, 2003. Applicant hereby requests entry of this Response and further consideration of the present application in view of the following remarks.

In the Office Action mailed on September 15, 2003, claims 1, 4-13, 15-19, 21-22, 24-25, and 35-38 were rejected under 35 U.S.C. §103(a) as being unpatentable over Lentz (U.S. Pat. No. 5,886,705) in view of Young, et al (U.S. Pat. No. 5,831,637) and Tanaka, et al. (U.S. Pat. No.5,793,376), and further in view of Saunders, et al (U.S. Pat. No. 6,046,747) and Kobayashi, et al. (U.S. Pat. No. 5,761,401), and claims 14, 20, and 26-34 were rejected under 35 U.S.C. §103(a) as being unpatentable over Lentz, Young, et al. and Tanaka, et al. in view of Saunders, et al., and further in view of Chimoto (U.S. Pat. No. 5,550,961). Applicant respectfully traverses these grounds of rejection and requests reconsideration thereof.

Claim 1

The Office Action rejected claim 1 under 35 U.S.C. §103(a) as being unpatentable over Lentz in view of Young, et al and Tanaka, et al., and further in view of Saunders, et al. and Kobayashi, et al. Applicant respectfully disagrees.

The Office Action stated that Lentz discloses a graphics accelerator with a single texture buffer, and a plurality of texture processors. However, the Office Action acknowledged that Lentz does not teach all the elements of claim 1, and the Office Action also supplemented Lentz teaching with the following references.

1. The Office Action stated that Lentz does not teach a texture buffer as claimed by the present invention, but the Office Action, based upon a definition from an on-line computer dictionary, concluded that it would be obvious to one skilled in the art to incorporate the texture buffer into the teaching of Lentz.
2. The Office Action stated that Lentz does not disclose performing texture operations by multiple texture processors wherein the plurality of processors retrieves texture

packets from a single texture buffer. The Office Action stated that Young, et al. teaching texture mapping with multiple texture processors.

3. The Office Action acknowledged that Young, et al. does not teach the plurality of processors accessing one single texture memory as recited in the pending claims of the present invention. However, the Office Action stated that Kobayashi, et al. discloses parallel processing units accessing a single texture buffer, and it would have been obvious to one skilled in the art to use the plurality of processors to retrieve data from a single texture buffer.
4. The Office Action further acknowledged that Lentz does not disclose a texture packet identifying the location of a texture map, but the Office Action stated that Tanaka, et al. discloses that a packet data that represents the storage location of a texture data/map. The Office Action concluded that it would have been obvious to incorporate the teaching of Tanaka, et al. into the teaching of Lentz.
5. Finally, the Office Action acknowledged that Lentz does not disclose a texture packet has data relating to the dimensional type of its texture map, but the Office Action stated that Saunders, et al. discloses a special bind texture call that includes a target parameter defining the dimension of a texture map. Therefore, it would have been obvious to one skilled in the art to incorporate the teaching of Saunders, et al. into the teaching of Lentz.

Applicant respectfully points out that the Office Action combined the teaching of five (5) patents (Lentz, Young, et al., Kobayashi, et al., Tanaka, et al., and Saunders, et al.) and one on-line computer dictionary to render claim 1 unpatentable. Besides not showing a proper motivation to combine all five references, it is clear that the Office Action used the present invention as the template and engaged in a hindsight reconstruction of the claimed invention, which the Court of Appeals for Federal Circuit has said is impermissible (*In Re Gorman*, 933 F.2d 982, Fed. Cir. 1991).

Therefore, Applicant submits that the rejection of claim 1 clearly relies upon an improperly motivated combination of references and requests the rejection to be withdrawn and solicits claim 1 to be allowed.

Claims 4-8

Claims 4-8 depend from claim 1, and Applicant asserts that claims 4-8 are allowable over the cited references for at least the same reasons asserted with respect to Claim 1.

Claim 9

The Office Action rejected claim 9 under 35 U.S.C. §103(a) as being unpatentable over Lentz in view of Young, et al and Tanaka, et al., and further in view of Saunders, et al. and Kobayashi, et al. Applicant respectfully disagrees.

The Office Action stated that Lentz discloses the method of claim 9. However, the Office Action acknowledged that Lentz does not teach all the elements of claim 9, and the Office Action also supplemented Lentz teaching with the following references.

1. The Office Action stated that Lentz does not disclose a texture packet identifying the location of a texture map. However, the Office Action stated that Tanaka, et al. discloses a packet data that represents the storage location of a texture data/map and it would have been obvious to one skilled in the art to incorporate the teaching of Tanaka, et al. into the teaching of Lentz.
2. The Office Action stated that Lentz does not disclose a texture packet has data relating to the dimensional type of its texture map. However, the Office Action stated that Saunders, et al. discloses a special bind texture call that includes a target parameter that defines the dimension of a texture map and it would have been obvious to one skilled in the art to incorporate the teaching of Saunders, et al. into the teaching of Lentz.

Firstly, the combination of three patents suggested by the Office Action fails to disclose a method employing a plurality of texture processors to locate a texture packet identifying the location of a texture map in a single memory as claimed. Lentz does not disclose performing texture operations by multiple texture processors wherein the plurality of processors retrieves texture packets from a single texture buffer as stated above for claim 1.

Secondly, Applicant respectfully disagrees with the motivation for combining Tanaka, et al. with Lentz. The Office Action stated that Lentz does not disclose a texture packet identifying the location of a texture map and Tanaka, et al. discloses a packet data that represents the storage location of a texture data/map, and the motivation to combine these two

patents would be to provide enhanced image data by converting the existing data format into a new improved format. Applicant does not discern, and the Office Action has not shown, how a motivation to provide enhanced image data by converting an existing texture format into a new improved format corresponds to a texture packet that identifies the location of a texture map.

Because the combination suggested by the Office Action failed to show each and every element of claim 9, as required under MPEP §706.02(j), and the Office Action failed to show a proper motivation to combine the references, Applicant respectfully asserts that this rejection has been overcome and requests that Claim 9 to be allowed.

Claims 10-14

Claims 10-14 depend from claim 9, and Applicant asserts that claims 10-14 are allowable over the cited references for the same reasons asserted with respect to Claim 9.

Claims 15-20

Independent Claim 15 and dependent Claims 16-19 cannot be rejected as unpatentable for the same reasons stated above supporting patentability of Claims 9-14.

Claims 21-22 and 24-25

Independent Claim 21 and dependent Claims 22 and 24-25 cannot be rejected as unpatentable for the same reasons stated above supporting patentability of Claims 1 and 5-6.

Claim 26

The Office Action stated that Lentz disclose the method in claim 26. However, the Office Action acknowledged that Lentz does not teach all the elements of claim 26, and the Office Action also supplemented Lentz teaching with the following references.

1. The Office Action stated that Lentz does not disclose a texture packet has data relating to the dimensional type of its texture map, but the Office Action also stated that Saunders, et al. discloses a special bind texture call that includes a target parameter defining the dimension of a texture map. Therefore, it would have been

obvious to one skilled in the art to incorporate the teaching of Saunders, et al. into the teaching of Lentz.

2. The Office Action also stated that the combination of Lentz, Tanaka, et al., and Saunders, et al. do not disclose converting the multi-dimensional texture map into a one dimensional texture map, but Chimoto discloses a way of expressing a two dimensional texture data as a one dimensional texture data. The Office Action further stated it would have been obvious to combine the teaching of Chimoto with the teaching of Lentz to operate high speed texturing without extensive use of texture memory.

Again, Applicant asserts that the Office Action fails to particularly point out the motivation in Lentz, Tanaka, et al., Saunders, et al., or Chimoto to combine these *four* teachings. The Office Action's approach improperly uses hindsight based on the present invention to defeat patentability of the same invention. As explained above, without explicit motivation to combine these four teachings, Claim 26 cannot be rejected as obvious in view thereof, and this ground of rejection must be withdrawn.

Claims 27-28

Claims 27-28 depends from Claim 26, and Applicant asserts that Claims 27-28 cannot be rejected for the same reasons asserted with respect to the patentability of Claim 26.

Claims 29-31

Claims 29-31 are patentable for the same reasons stated above regarding Claims 26-28.

Claims 32-34

Claims 32-34 are patentable for the same reasons stated above regarding Claims 26-28.

Claim 35

The Office Action rejected claim 35 under 35 U.S.C. §103(a) as being unpatentable over Lentz in view of Saunders, et al. Applicant respectfully disagrees.

As explained above, no suggestion has been shown for combining the cited references in either Lentz or Saunders, et al. The Office Action's approach improperly uses hindsight

based on the present invention to defeat patentability of the same invention. As explained above, without explicit motivation to combine these two teachings, claim 35 cannot be rejected as obvious in view thereof.

Claims 36-38

Claims 36-38 depend from claim 35, and Applicant asserts that claims 36-38 are allowable over the cited references for the same reasons asserted above with respect to Claim 35.

Conclusion

In view of the foregoing remarks, Applicant respectfully submits that Claims 1, 4-22, and 24-38 are in condition for allowance and entry of the present amendment and notification to that effect is earnestly requested. If necessary, the Examiner is invited to telephone Applicant's attorney (404-873-8734) to facilitate prosecution of this application.

Respectfully submitted,

Edwards.
By his Representatives,

Arnall Golden Gregory LLP
1201 West Peachtree Street, Suite 2800
Atlanta, GA 30309-3450

Li K. Wang
Reg. No. 44,393

Date 10/30/03

CERTIFICATE UNDER 37 CFR 1.8: The undersigned hereby certifies that this correspondence is being deposited with the United States Postal Service with sufficient postage as first class mail, in an envelope addressed to: Commissioner of Patents, Washington, D.C. 20231, on this 30 day of Oct, 2003.

Lucille Golden-Blakey

Name

Signature